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CC 98-67

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Federal Communications Commission
Office of the Secretary

**Presented to the
Federal Communications Commission
Washington, D.C. 20554**

In the matter of

CC Dkt No. 98-67

Comments of Gina Gonzalez, Video Interpreter

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Allow me to introduce myself, I am a Child of a Deaf Adult (CODA) and I am also currently a video interpreter. Both are something I am very proud of being. Video interpreting has in more ways than one inspired me and allowed me the privilege of a glimpse to one my purposes for living. I hope to continue being a video interpreter for many years to come. Being born to a Deaf mother was definitely a blessing in disguise because it made acquiring American Sign Language possible. It has served as a compass to finding my path to video interpreting. It was not an easy trek to reach this part of the itinerary.

If you have an altruistic fiber, a caring strand, or a compassionate molecule in your structure, which I assume you do if you have read this much of my letter. You may often find yourself wanting to do more to contribute towards the quality of life of the people you come across. I have been able to do that through video interpreting. I had been an interpreter for about seven years, before becoming a video interpreter. I have always felt a sense of accomplishment and fulfillment in my work, but never at the scale that I do now.

The first time I received a video call and bridged the worlds of a Deaf adult video caller and his mother, required every ounce of strength to keep me from crying in the middle of the call. I did cry, only it was after the call. I had found my calling and I would never turn back or away. Interpreting for Deaf and Hard of Hearing consumers in the community for a routine medical check-up, job interview, or seminar have always been important, but I had never experienced such a wondrous fulfilling sensation as I did the first day at work as a Video Interpreter. An even greater sensation was the day that Spanish to American Sign Language and vice versa was added to Video Relay Service. Again, I bridged the worlds of children and their parents, cousins, and siblings. I was willing to go on for hours at a time because this was such a limited service and there weren't many of us to provide the service. It was difficult to take care of myself without wanting to make the service accessible to this faction of the Deaf community. Shortly thereafter, the number of trilingual interpreters increased. Unfortunately, the service could no longer be provided.

Without Video Relay, these callers would have never known each other at level that they did through VRS. They may have gone to their graves not knowing what their father's favorite movie, or their mother's maiden was. Traditional relay doesn't provide the telecommunication accessibility these people needed. This faction has been left with a memory and the longing to once again connect with those they love and to feel self-sufficient and adequate as human beings.

Not only does Video Relay make personal bonding with family members more tangible, but also it empowers the callers to be more self sufficient and assertive. I have seen some callers go from a shy, timid one to two demure words to a "I know what my rights are and you are not going to walk all over me as I have allowed many others to do to me" attitude. It is a beautiful thing to see. I am watching people take on the characteristics of caterpillars metamorphosing into beautiful butterflies right before my eyes. These are the types of people for whom I want to continue to relay calls; people whose lives have been pleasantly altered because of Video Relay.

How is any of this relevant to CC Dkt No. 98-67? Since the reduction of the reimbursement rate by the FCC, my employer has had to cut back on personnel and the

Spanish/ASL service. It has been painful to inform our callers that Spanish/ASL is no longer available to them. We have essentially taken away functional equivalence to this faction of the disabled community. We have barred them from the privileges that other Deaf and Hard of Hearing video callers have been able to enjoy through ASL/English Video Relay. Throughout the nation the Spanish speaking communities have been catered to through government and non-government based bi-lingual notifications, ads, and a myriad of means of communications. However, the needs Deaf and Hard of Hearing people of these Latino communities are not being met. There is a great need for Spanish/ASL Video Relay among these communities. Spanish/ASL Video Relay is no different than English/ASL Video Relay. It is a translation of a visual language to a spoken language for the purpose of providing functional equivalence for disabled people as mandated by the ADA. Latino people of this country have access to literature, telecommunications, and other means of media, which is designed to meet their need for translation of written or spoken English into their native tongue (Spanish). It seems to me, that if anyone's needs require meeting it would be the needs of the disabled (Deaf) Latino community

Furthermore, this decision to reduce the reimbursement rate is threatening the viability of this true functionally equivalent service. Sign Language interpreting is a growing field, but it requires a combination of extensive training and an innate ability to excel in this field. Just like world-renowned heart surgeons or scientists, there are a few of us who can adequately and sufficiently provide this service. I am among some of the best interpreters in the field of interpreting and perhaps even better as a video interpreter. Video interpreting is even more specialized and demanding and it requires the cream of the crop. Due to the cutbacks in personnel, some of us are getting hurt due to over exposure to repetitive motion and the longer period of time we have to remain in calls before receiving relief. I have never experienced any ailments in all the years as an interpreter. I have been a video interpreter since it's unofficial commencement (3 years), yet I was still healthy and able to do my job because there was sufficient relief. Since August, fellow video interpreters and myself have begun to experience the ramifications associated with the ruling. We are in danger of being permanently disabled, which threatens our ability to make a living. Some of us rely solely on interpreting as a means to make a living. Not being able to interpret or minimizing our work schedules puts us at risk of materially adverse change.

Collectively, fellow Video Interpreters and myself have addressed these issues with our employer. Our employer is compassionate to our needs, but unable to act swiftly in meeting our needs because of budgetary reasons. In order to continue providing the service and meet our needs, they need to receive not only a fair cost recovery fee but enough to maintain personnel, quality of service, and research and development.

We have asked that risk management measures exclusive to video interpreting be researched and implemented, wellness program initiatives taken, better equipment and work stations set ups that are ergonomically suitable provided. These are some of the things we have identified, there are many more. However many of the needs are nearly impossible to be accommodated at the current reimbursement rate.

I have researched potential earnings for community/standard (Non-video interpreting) sign language interpreters, which far exceed our current earnings as Video Interpreters. What it translates into is that Video Interpreting is a lesser attractive field to

work in. On top of that, the work hazard elements are greater than that of community/standard interpreting. I would like to say that nothing would deter me from doing video interpreting, but if my employer is unable to meet its financial goals, they could be forced to let some of us go. Another factor is the on-going problem of insufficient personnel. If it persists, it will result in an injury, which would permanently remove some of us from this field. It would not only be a great loss for the centers we work in, but the lives of the video callers who have the opportunity to experience true functional equivalence through our video interpreting abilities.

It is essential that the FCC mandates for the provision of Spanish/ASL Video Relay, that not only the viability of this service remains for many years, but quality and accessibility is optimal, and that the reimbursement rate is increased to ensure that all areas of Video Relay are thoroughly addressed. Since Video Relay Service is in its infancy, all areas of VRS remain invisible or undetectable, however we have identified, that the well being of the video interpreters is an element to consider and address. Risk management needs to be promoted.

Before concluding my letter, I would like to state that my employer has no knowledge of this letter. I have taken the liberty and the initiative to address my concerns to the FCC because I believe that the people in the trenches need to be heard. I am not alone. There are many fellow video interpreters who are participating in a collective effort to maintain morale, motivation, and quality service at the expense of our physical well being. We are aware of the importance of this service and we love our jobs, but we can no longer put our passion for this job before our physical well being.

Clearly, the FCC recognizes that VRS is providing functional equivalence telecommunications access for people with hearing disabilities, but it's failing to mandate it as such. Such failure and the lack of support for better reimbursement rates, and provision of Spanish/ASL is like the FDA not approving the electric wheel chair. Although the manual wheel chair was a great invention, it didn't meet the needs of all physically disabled people. Scooters, electric wheel chairs and other devices have since been created to enhance the lives of physically disabled people. Video Relay Service is no different than the equipment and devices developed for the purpose of enhancing the quality of life for people with disabilities. It is not just life enhancing, it is absolutely necessary to have for some factions of the Deaf and hard of hearing community.

Sincerely and respectfully,

Gina Gonzalez Video Interpreter # 3023